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6 Attorneys for Defendants
7 MASTER MARKETEERS, INC.,
and SUSAN PACINI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 CHANEL, INC., a New York corporation,

14 Plaintiff,

15

v.

16 SUSAN LYNNE PACINI aka SUSAN L. PACINI dba
17 PLANET TAN dba MASTER MARKETERS, INC.,
and DOES 1-10, inclusive,

Defendants.

CASE NO. CV-07-05946 CRB

**SUPPLEMENTAL DECLARATION
OF SUSAN PACINI IN SUPPORT OF
DEFENDANT PACINI'S MOTION TO
SET ASIDE DEFAULT [FRCP 55(c)]**

Date: May 30, 2008
Time: 10:00 a.m.
Courtroom: 8, 19th Floor
Honorable Charles R. Breyer

19 I, SUSAN PACINI, declare under the penalty of perjury that:

20 1. I am a defendant in the above-entitled case and am an officer of Master Marketeers
21 Inc.

22 2. I am competent to testify regarding the matters stated herein based upon my own
23 personal knowledge and I could testify as to these matters in a Court of Law.

24 3. During the summer of 2007, Master Marketeers Inc. purchased and sold several
25 purses and other merchandise in the tanning salon. The subject merchandise was purchased at the
26 Galt Market in Galt, California. On every Tuesday, the Galt Market holds an open-air market
27 where wholesalers of goods sell supplies and merchandise to retailers. In fact, whenever we

1 purchased anything from this market, I was required to show the company's reseller license. We
 2 do not possess receipts for these purchases. Our business is a small operation and we do not have
 3 the formalities in place to retain invoices or receipts for the merchandise purchased so long ago.

4. I believed that the merchandise that was labeled "Chanel" that was purchased was
 5 genuine and not "knock offs" or "counterfeits." I was told by the person who sold the purses that
 6 the purses were "last season's" designs and were leftovers. We purchased the Chanel
 7 merchandise from several of the vendors at the Galt Market.

8. There was nothing about these products that indicated to me that they were
 9 anything but genuine.

10. In December 2007, Mr. Knox discussed the complaint with me and suggested that
 11 he would continue to try to resolve the matter. I called him on several occasions after sending
 12 him the complaint, but I heard nothing from him. I assumed that he was my attorney and the
 13 attorney for the company, and that he was taking all steps that were required.

14. I did not hear from Mr. Knox until he called me in early April 2008. In that
 15 telephone conference he stated that a deadline had been missed and that I should retain civil
 16 counsel. Within days, I retained the law firm of Tingley Piontkowski LLP.

17. I declare under the penalty of perjury that the foregoing statement is true and correct and
 18 is made under the laws of the State of California and the United States. This declaration is being
 19 made in Discovery Bay, California, on May 13, 2008.

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21 Dated: May 13, 2008

/s/ Susan Pacini

SUSAN PACINI

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1 I hereby attest that I have on file all holograph signatures for any signature indicated by
2 "conformed" signature (/s/) within this e-filed document.

3 Dated: May 14, 2008

TINGLEY PIONTKOWSKI LLP

4 By: /s/ Bruce C. Piontkowski

5 BRUCE C. PIONTKOWSKI
6 Attorneys for Defendant

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